

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

GREG JEFFERS,

Plaintiff,

v.

METROPOLITAN LIFE INSURANCE
CO., as Administrator; and
COMMONWEALTH ANNUITY
AND LIFE INSURANCE CO.

Defendants.

Case No.: _____

NOTICE OF REMOVAL

Pursuant to 28 U.S.C. §§ 1441 and 1446, Defendants Metropolitan Life Insurance Company and Commonwealth Annuity and Life Insurance Company hereby give notice of the removal of this case from the Circuit Court of Wilson County, Tennessee to the United States District Court for the Middle District of Tennessee, Nashville Division. In support of this Notice of Removal, Defendants aver as follows:

1. This Notice of Removal is filed pursuant to 28 U.S.C. § 1441, 1446 and 1332.
2. On January 4, 2013, the Plaintiff commenced this action by filing a Complaint in the Circuit Court of Wilson County, Tennessee. A copy of the Complaint is attached hereto as Exhibit A.
3. On or about January 11, 2013, Defendants received a copy of the Complaint.
4. Plaintiff is, and at the time of filing this action was, a citizen and resident of Wilson County, Tennessee. See Exhibit A, Complaint, at ¶ 1.
5. Metropolitan Life Insurance Company ("MetLife") is a New York corporation

with its principal place of business located in the State of New York.

6. Commonwealth Annuity and Life Insurance Company ("Commonwealth") is a Massachusetts corporation with its principal place of business in the Commonwealth of Massachusetts.

7. The Court therefore has original jurisdiction of this case pursuant to 28 U.S.C. § 1332 because there is complete diversity between Plaintiff and Defendants.

8. Further, Plaintiff seeks at least \$270,498.00 in damages from Defendants. *See Exhibit A*, Complaint, at ¶ 9. This Court has original jurisdiction in controversies between citizens of different states where the matter in controversy exceeds the sum or value of \$75,000, exclusive of interest and costs pursuant to 28 U.S.C. § 1332(a)(1).

9. Pursuant to 28 U.S.C. § 1446(b), this Notice of Removal is being filed within thirty (30) days of MetLife's first receipt, by service or otherwise, of a copy of the initial pleading setting forth claims for relief upon which the state court proceeding is based, and therefore it is timely filed.

10. The United States District Court for the Middle District of Tennessee, Nashville Division is the federal judicial district encompassing the Circuit Court of Wilson County, Tennessee, where this suit was originally filed. 28 U.S.C. § 124(b)(2). Venue therefore is proper in this district under 28 U.S.C. § 1441(a).

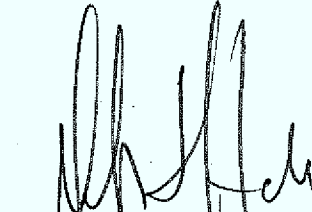
11. Accordingly, this action may be removed from the Circuit Court of Wilson County, Tennessee, and brought before the United States District Court for the Middle District of Tennessee, Nashville Division pursuant to 28 U.S.C. §§ 1332(a)(1), and 1441(a).

12. Pursuant to the provisions of 28 U.S.C. § 1446(d), MetLife will promptly file a copy of this Notice of Removal with the clerk of the Circuit Court of Wilson County, Tennessee,

and will serve a copy of the same upon Plaintiff.

WHEREFORE, Defendants remove this case from the Circuit Court of Wilson County, Tennessee to the United States District Court for the Middle District of Tennessee, Nashville Division.

DATED: January 28th, 2013.



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*Attorneys for Defendants Metropolitan Life
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Annuity and Life Insurance Co.*

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing document upon the following by personal service and U.S. mail, on this 28th day of January, 2013:

Greg Jeffers
500 Burford Rd.
Lebanon, TN 37087
Plaintiff Pro Se

